OXYCHEM COMMUNITY INVOLVEMENT GROUP

Wednesday, April 30, 2014

6:15 food ready -- 6:35 business - adjourn by 8:30 p.m.

OxyChem Wichita Plant Cafeteria

6200 South Ridge Road parking and entry directions below

- 6:15 Food ready
- 6:30 Gather
- 6:35 Welcome -- Agenda review -- Introductions
 Approval of Feb. 27 meeting notes
 Meeting groundrules review

Updates

- From plant
- From members

7:00 EPA on Corrective Action Program

Corrective Action is the name of the EPA program under which the plant has been investigating on-site and off-site groundwater and soils. Brad Roberts, EPA project manager for the plant's corrective action program, will be our April speaker. He has been asked to explain or provide the following:

- a brief overview of the corrective action program and EPA's role
- what EPA looks for, their expectations for solutions to landfill, soils, and groundwater problems
- what the agency's general approach has been in recent years to landfills like the one on the plant site that pre-date RCRA
- EPA's public participation process, both formal and informal
- how Glenn Springs Holdings is doing

Mostafa Kamal, KDHE Hazardous Waste Permits Section Chief, will be on hand as a resource to help us understand what role the state agency plays in the corrective action work.

8:15 Plans for Upcoming Meetings

All will be from 6:30 – 8:30 p.m. at the plant cafeteria unless otherwise noted

Thurs. June 26 – – Brinefields and New Water Infrastructure: Overview and Tour

- Overview of brinefield operations.
- Bus tour to the brinefields and to see the new infrastructure that is allowing a reduction in water usage.



Tues. Aug. 26 – annual report from Glenn Springs Holdings on correction action program for on-site and off-site groundwater and soils. Water rights (surface water and groundwater). More details in Program Plan.

- Thurs. Nov. 13 Geologist(s) on the potential impacts of seismic activity and fracking. Differences between fracking and deepwells and any risk to deepwells. More details in Program Plan.
- 8:20 Observer comments
- 8:30 Adjourn

Contact facilitator Diane Sheridan with questions or RSVPs at dbsfacilitator@gmail.com or 800-484-9212 code 4127 use this **NEW** email. Delete DBSheridan@aol.com

DIRECTIONS

OxyChem Wichita Plant Cafeteria (in the Administration Building) 6200 South Ridge Road

Parking is across the street in the employee lot. A few places are available in the lot to the *north* of the Admin Bldg. Entry is through the white fencing on the south side of the Admin Bldg. An OxyChem employee will be at the door to help attendees enter the building from 6:00- 6:40pm.

After that, call Lisa Thurman at 316-516-5566 or contact the security guard.

MISSION STATEMENT

The OxyChem Community Involvement Group (CIG), representing a cross-section of the Wichita Metropolitan area, works in partnership with OxyChem to improve plant-community interaction. The CIG serves as a conduit for conveying community concerns to the plant and for the plant to share information about OxyChem's operations with the intent to resolve community concerns.

GOALS

- In the community interest, the CIG will participate with OxyChem's management to promote conduct of chemical plant operations that is safe and environmentally responsible.
- The CIG will review and provide feedback on
 - o reports of monitoring of air and water emissions
 - remediation activity and reports submitted to KDHE and EPA
 - o reports on pollution prevention, deepwells, and water usage
 - o other environmental studies
 - o safety performance
- The CIG will assist in long term planning for plant facilities and operations by providing a community perspective.
- The CIG will promote ongoing communications between OxyChem and the community.
- The CIG will develop plans to carry out its mission and goals, including annual Program Plans and a communications plan.

Roberts, Bradley

From:

Diane B. Sheridan dbsheridan@aol.com

Sent:

Wednesday, March 05, 2014 5:28 PM

To: Subject: juan_somoano@oxy.com; Roberts, Bradley; Nancy_Thimmesch@oxy.com

CIG April 30 plans

Brad

cc: Juan and Nancy

As you requested, I checked with members at the OxyChem Community Involvement Group (CIG) meeting last week to see if they had additional requests for you. They provided a bit more detail about the subjects they would like you to cover. I've listed them below.

They asked that I find out whether KDHE has any decisionmaking role in the corrective action program and, if they do, the members would like to have them at the meeting also unless there is some problem doing that. Jack Brown had seen something about delegation of the program that he recalled when others asked about this. He sent me the memo but I'm still not clear what the situation is. So I will rely on Juan or you to let me know whether we should be including KDHE...

Here is a slightly expanded version of the topic description I previously provided. Members are all very pleased that you will be with us.

Nancy, I talked to Juan about my getting together with Brad and him at 5:00 p.m. on meeting night so I can be sure that I understand the public participation process in particular. Will that be possible? I know it means that someone has to let me in and be there.

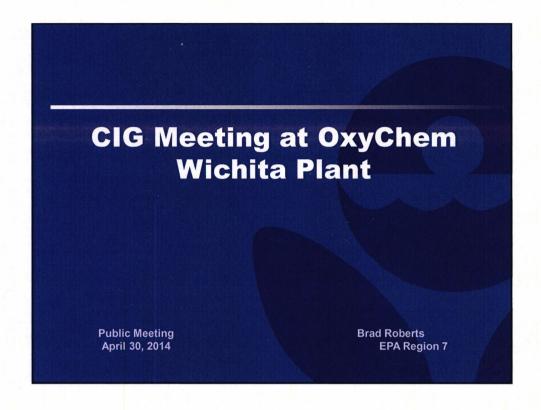
Thanks, Diane

Diane Sheridan 281-326-5253 DBSheridan@aol.com

Wed. April 30, 2014 – EPA on Corrective Action Program –EPA's Brad Roberts, project manager for the plant's corrective action program, has been invited to explain the following:

- a brief overview of the corrective action program, the current stage, and EPA's role in the program
- what EPA looks for, and their expectations for solutions to landfill, soils, and groundwater problems
- what the agency's general approach has been in recent years to landfills like the one on the plant site that pre-date RCRA
- what role KDHE plays in the corrective action work, especially any decisionmaking role*
- EPA's public participation process, both formal and informal
- how EPA feels Glenn Springs Holdings is doing

If KDHE has a decisionmaking role in the corrective action work at the Wichita plant, members would like to include them in the April 30 meeting.



Requested Talking Points

- Overview of corrective action program, current stage & EPA's role
- What EPA looks for & their expectations for solutions to landfill/soils/groundwater problems
- 3. What the agency's general approach has been in recent years to landfills, like the one on the plant site, that pre-date RCRA

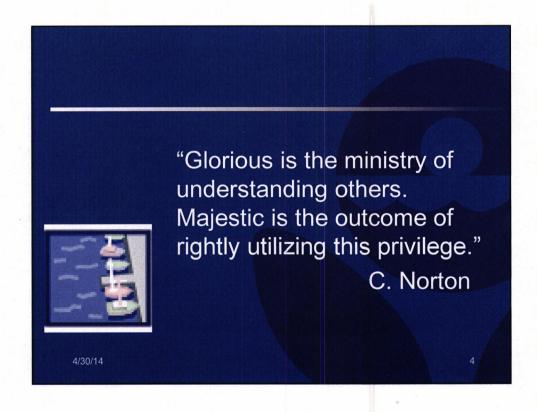
Requested Talking Points (Cont.)

- What role KDHE plays in the corrective action work, especially any decision-making
- 5. EPA's public participation process, both formal and informal



6. How EPA feels Glenn Springs Holdings is doing

4/30/14



Objective of EPA's RCRA Corrective Action Program

Evaluate releases of hazardous waste constituents at hazardous waste treatment storage and disposal facilities and develop and implement remedial measures to protect human health and the environment by addressing risk-reduction and final cleanup.



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Components of Corrective Action

1. Locate the source(s) of the release(s) of contaminants (e.g., regulated units, solid waste management units, and other source areas).

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Components of Corrective Action

2. Characterize the nature & extent of contamination both within the facility boundary and migrating beyond. This includes defining pathways of migration of the hazardous waste constituents, including the media affected, the extent, direction and speed, as well as complicating factors influencing movement.

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Components of Corrective Action

- 3. Identify areas and populations threatened by releases from the facility.
- 4. Determine actual and potential threats of releases from the facility to human health and/or the environment in both the short and long term.

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Components of Corrective Action

5. Identify and implement an interim or stabilization measure(s) to abate further spread of contaminants or control the source of contamination.

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Components of Corrective Action

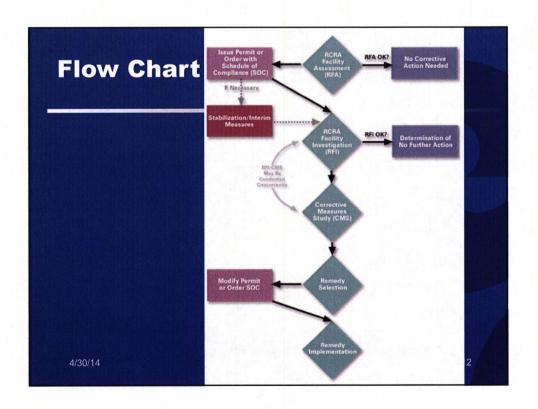
- 6. Evaluate the overall integrity of containment structures and activities at the site intended for long-term containment.
- 7. Identify, develop, and implement a corrective measure(s) to prevent and remediate releases of hazardous waste or constituents from the facility.

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Components of Corrective Action

8. Design a program to monitor the maintenance and performance of any interim or final corrective measure(s) to ensure that human health and the environment are being protected.

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RCRA Facility Assessment (RFA) - must answer the questions:



- Is there a current release and/or imminent threat?
- Is there a potential release and/or imminent threat?

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Stabilization/Interim Measure

- Required of the facility to address in the near term a release and/or an imminent threat, or potential imminent threat.
- Implementation of an interim measure can be required as necessary at any step in the corrective action process.

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RCRA Facility Investigation (RFI) -must answer the question:

- How significant is the release and/or imminent threat or potential imminent threat?
- It also provides further definition of the release, potential release, and/or imminent threat or potential imminent threat.



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Corrective Measures Study (CMS)

 Determine how best to address the release(s) or potential release(s) and/or imminent threat or potential imminent threat.



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Corrective Measures Study Review by EPA

- Threshold Criteria Include:
- Protect Human Health & the Environment
- Attain Media Cleanup Standards
- Control Source(s) of Release
 - Comply with standards for Management of Waste

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Corrective Measures Study Review by EPA

- Balancing Criteria Include:
- Long-Term Effectiveness
- Toxicity, Mobility & Volume Reduction
- Short-term Effectiveness
- Implementability
- Cost
- Community Acceptance
- State Acceptance

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Expectations for Final Remedies

- 1) Use treatment to address principle threats
- 2) Return groundwater to maximum beneficial use
- 3) Use engineering controls, such as containment
- Use a combination of methods to achieve protection
- 5) Use institutional controls to supplement
- 6) Consider using innovative technology
- 7) Remediate contaminated soils to prevent direct exposure and transfer of contaminants from soils

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Remedy Decision

- Following the evaluation of the remedy alternatives presented in the CMS Report, EPA selects a remedy to propose for public comment.
- EPA drafts a "Statement of Basis" document, which explains the selected remedy and the rationale for selecting it. EPA develops an Administrative Record including pertinent documents from files, along with the "Statement of Basis."

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Public Involvement in the Decision

- EPA provides notice in a local newspaper, and sends notice to the facility's mailing list; then, with the Administrative Record in the public repository for review, time is allowed for written public comments to be submitted.
- EPA can host an informal "Availability Session" to allow people to ask questions.
- EPA can hold a formal Administrative Hearing (not intended for answering questions) to record oral comments.

oral commonte.

EPA Response to Public Input

- Based on the comments received, EPA may change the selected remedy if appropriate.
- After consideration of all comments received, EPA writes a "Response to Comments/Final Remedy Decision" document, which is sent to each person who submitted a comment.



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Corrective Measures Implementation

- Facility is Required to submit an implementation plan
- Implement the selected remedy
- Perform maintenance & monitoring until no longer necessary



4/30/12

